

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

MOM CA Investco LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10321 (BLS)

(Jointly Administered)

Re: Docket Nos. 8, 83, 167, 216, 396, 524, 545, 577,  
629, & 684

**CERTIFICATION OF COUNSEL REGARDING TENTH  
INTERIM ORDER (I) AUTHORIZING POSTPETITION USE OF  
CASH COLLATERAL; (II) GRANTING ADEQUATE PROTECTION;  
(III) MODIFYING AUTOMATIC STAY; (IV) SCHEDULING A  
FINAL HEARING; AND (V) GRANTING RELATED RELIEF**

The undersigned hereby certifies (the “Certification”) as follows:

1. On March 11, 2025, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief* [Docket No. 8] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. On March 19, 2025, the Court entered the *Interim Order (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying Automatic Stay;*

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<sup>1</sup> The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor’s federal tax identification number, are: MOM CA Investco LLC [6263], MOM AS Investco LLC [6049], MOM BS Investco LLC [6180], Retreat at Laguna Villas, LLC [2046], Sunset Cove Villas, LLC [9178], Duplex at Sleepy Hollow, LLC [9237], Cliff Drive Properties DE, LLC [0893], 694 NCH Apartments, LLC [0318], Heisler Laguna, LLC [4709], Laguna Festival Center, LLC [4073], 891 Laguna Canyon Road, LLC [0647], 777 AT Laguna, LLC [8715], Laguna Art District Complex, LLC [8316], Tesoro Redlands DE, LLC [2764], Aryabhata Group LLC [7332], Hotel Laguna, LLC [9580], 4110 West 3rd Street DE, LLC [8641], 314 S. Harvard DE, LLC [2057], Laguna HI, LLC [6408], Laguna HW, LLC [9470], The Masters Building, LLC [6134], 837 Park Avenue, LLC [3229], and Terra Laguna Beach, Inc. [2344] (interim). The Debtors’ headquarters are located at 520 Newport Center Drive, Suite 480, Newport Beach, CA 92660.

*(IV) Scheduling a Final Hearing; and (V) Granting Related Relief* [Docket No. 83] (the “First Interim Order”).

3. Following entry of the First Interim Order, the Debtors subsequently sought and obtained a series of further interim orders,<sup>2</sup> and most recently, on July 17, 2025, the Court entered the *Ninth Interim Order (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief* [Docket No. 684] (the “Ninth Interim Order”).

4. While the parties continue to discuss outstanding issues and participate in mediation on July 30, 2025, the Debtors have prepared a proposed tenth interim order regarding the use of cash collateral in the form attached hereto as **Exhibit A** (the “Proposed Tenth Interim Order”).

5. The Proposed Tenth Interim Order has been circulated to counsel to the Office of the United States Trustee, counsel to the Real Property Lenders<sup>3</sup>, counsel to 4G Wireless, Inc. and Mohammad Honarkar, and counsel to Specialty DIP, LLC, none of whom have indicated that they object to entry of the Proposed Tenth Interim Order. For the convenience of the Court and all parties in interest, a blackline of the Proposed Tenth Interim Order against the Ninth Interim Order is attached hereto as **Exhibit B**.

*[Remainder of Page Intentionally Left Blank]*

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<sup>2</sup> See Docket Nos. 167, 216, 396, 524, 545, 577, and 629.

<sup>3</sup> “Real Property Lenders” means Enterprise Bank & Trust, PMF CA REIT, LLC, Lone Oak Fund, LLC, Wilshire Quinn Income Fund, LLC, Preferred Bank, Banc of California, and Pacific High Yield Fund 1, LLC.

WHEREFORE, the Debtors respectfully request that the Proposed Tenth Interim Order, attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

Dated: July 30, 2025  
Wilmington, Delaware

Respectfully submitted,

/s/ Gregory J. Flasser

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